

Law Office of Mohammed Gangat

Representing Employees in Employment and Discrimination Law and Related Litigation

May 4, 2021

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via ECF

U.S. District Judge Cathy Seibel
United States District Court
Southern District of New York
300 Quarropas St.,
White Plains, NY 10601-4150

Re: Galo Morocho, et. al., v. New Broad Street Automotive, et. al.,
No. 7:20-cv-07738-CS

To the Honorable Judge Seibel:

I represent Plaintiffs Galo Morocho, Jose Estrada, and Luis Zambrano in the above action. I write jointly with Defense Counsel to request an extension of (1) the Depositions Deadline which is currently May 20, 2021; and (2) the Fact Discovery Deadline in this action, which is currently June 21, 2021. The parties also respectfully request an adjournment of the Case Management Conference scheduled for June 29, 2021.

This is the first time requesting an extension and/or adjournment. The reason for this request is that the parties have engaged in two mediation conferences as per Your Honor's Referral Order of October 29, 2020. The parties participated in the first mediation conference on January 20, 2021 and the second on April 23, 2021. A third mediation conference is scheduled for May 10, 2021.

The parties have invested a lot of time and effort in this mediation process and believe a resolution through mediation is likely.

Accordingly, the parties request a 60-day extension for all deadlines and conferences mentioned above to give the parties the opportunity and time to focus on a potential resolution through mediation.

Thank you, in advance, for your time and attention to this matter.

The parties were aware that mediation and discovery were supposed to proceed concurrently, but I will grant one extension on the representation that the parties are close. All deadlines are extended 60 days. The 6/29/21 conference is adjourned to 9/10/21 at 10:30 am. Pre-motion letters are due two weeks before, with responses due one week before.

Respectfully Submitted,
/s/ Mohammed Gangat
Mohammed Gangat, Esq.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

5/5/21